

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PASZ AUF TRAINING FILMS, INC.,)	
Plaintiff,)	
)	07 CV 7021 (PKL)
v.)	
)	
MANUEL PARRISH,)	
Defendants.)	
)	

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFFS' MOTION TO
AMEND COMPLAINT**

Pursuant to Fed. R. Civ. P. 15(a) Plaintiffs request that this Court accept and enter the Amended Complaint attached hereto as Exhibit 1. Plaintiffs have requested permission from Defendants to file the within Amended Complaint and Defendants consented to such filing.

Fed. R. Civ. P. 15(a) sets forth the procedure for filing amended pleadings. Specifically providing that leave to amend "shall freely be given when justice so requires." Id. Fed. R. Civ. P. 15(a) contemplates a liberal application, freely permitting amendments and this policy has been consistently accepted and enforced by the federal courts in an effort to permit all parties to completely present their case. Foman v. Davis, 371 U.S. 178 (1982). It is the policy of the federal courts that all controversies should be decided upon their merits rather than upon technicalities in the pleadings. The federal courts permit parties to amend their pleadings freely, only refusing such amendments where an amendment would be futile or would serve no legitimate purpose. See Correa-Martinez v. Arrillaga-Belendez, 903 F.2d 49, 56, C.A. 1 (Puerto Rico) (1990). Here, leave is requested by Plaintiff to file an Amended Complaint in order to assert claims for

copyright infringement. Plaintiffs were awaiting registration, as required, to allege these claims.

CONCLUSION

For the foregoing reasons, Plaintiffs respectfully request that the Court grant the present motion for leave to file aforementioned described Amended Complaint.

Date: October 3, 2007

Respectfully submitted,
Plaintiffs,
By their attorneys,

/s/ Jennifer Meredith
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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of October, 2007 the within was served, via first class mail, upon the attorney of record listed below:

Ravi Ivan Sharma
404 Park Avenue
14th Floor
New York, New York 10016

/s/ Jennifer Meredith

Jennifer Meredith